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Attorney for HONG XIANG DONG

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:20-cr-00108-TLN
Plaintiff,)	STIPULATION REGARDING
vs.)	EXCLUDABLE TIME PERIODS
HONG XIANG DONG, YI ZHU LIN, QI)	UNDER SPEEDY TRIAL ACT AND
GUO LIN, HONG JU DONG, AND)	ORDER
QIHUA PAN,)	Date: August 22, 2024
Defendants.)	Time: 9:30am
)	Judge: Hon Judge Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on August 22, 2024.
2. By this stipulation, the defendants now move to continue the status conference until November 14, 2024, and to exclude time between August 22, 2024, and November 14, 2024 under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for the defendants desire additional time to review the voluminous discovery, counsel with their clients, conduct investigation and research related to the criminal charges, and otherwise prepare for trial.

- 1 b) Counsel for the defendants believe that failure to grant the above-requested
2 continuance would deny them the reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.
4 c) The government does not object to the continuance.
5 d) Based on the above-stated findings, the ends of justice served by continuing
6 the case as requested outweigh the interest of the public and the defendant in a
7 trial within the original date prescribed by the Speedy Trial Act.
8 e) For the purpose of computing time under the Speedy Trial Act, 18
9 U.S.C. § 3161, et seq., within which trial must commence, the time period of
10 August 22, 2024 to November 14, 2024, inclusive, is deemed excludable
11 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4]
12 because this is a complex case and it results from a continuance granted by the
13 Court at defendant's request on the basis of the Court's finding that the ends of
14 justice served by taking such action outweigh the best interest of the public and
15 the defendant in a speedy trial.
16 4. Nothing in this stipulation and order shall preclude a finding that other provisions
17 of the Speedy Trial Act dictate that additional time periods are excludable from
18 the period within which a trial must commence.
19

20 **IT IS SO STIPULATED.**

21
22 DATED: August 13, 2024

PHILLIP A. TALBERT
United States Attorney

23
24 /s/ Roger Yang
25 ROGER YANG
26 Assistant U.S. Attorney
27
28

1 DATED: August 13, 2024

2
3 /s/ Emily E. Doring
4 EMILY E. DORINGER
5 Attorney for Yi Zhu Lin

6
7 DATED: August 13, 2024

8
9 /s/ Malcolm S. Segal
10 MALCOLM S. SEGAL
11 Attorney for Yi Zhu Lin

12 DATE: August 13, 2024

13 /s/ Thomas A. Johnson
14 THOMAS A. JOHNSON
15 Attorney for Hong Xiang Dong

16 DATE: August 13, 2024

17 /s/ William F. Portanova
18 WILLIAM F. PORTANOVA
19 Attorney for Qi Guo Lin

20 DATE: August 13, 2024

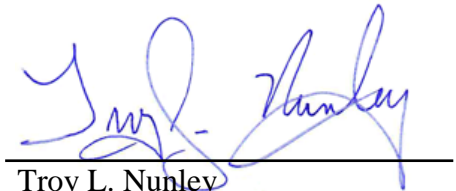
21 /s/ Jay Rorty
22 JAY RORTY
23 Attorney for Hong Ju Dong

24 DATE: August 13, 2024

25 /s/ Matthew Clinton Smith
26 MATTHEW CLINTON SMITH
27 Attorney for Qihua Pan
28

ORDER

IT IS SO FOUND AND ORDERED this 13th day of August 2024


Troy L. Nunley
United States District Judge